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March 28, 2018

Honorable Analisa Torres  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

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\*Sent via ECF

In re: Plaintiff's Status Report for *Rebecca Castillo v. Anne Fontaine USA, Inc.* Case No. 1:18-cv-00422

Dear Judge Torres:

As Your Honor is aware, we represent the Plaintiff Rebecca Castillo ("Plaintiff") in this matter. We write to inform Your Honor that we are in the process of perfecting service of the Amended Complaint that was filed on March 15, 2018. The original complaint inadvertently named Defendant as *Anne Fontaine, Inc.* instead of *Anne Fontaine USA, Inc.* and was sent for service via the New York Secretary of State. On February 21, 2018, the executed summons was filed stating that the New York Secretary of State's office accepted service on behalf of *Anne Fontaine, Inc.* on March 8, 2018. The Initial Conference was set for March 19, 2018, and on March 12, 2018, Defendant's counsel had neither appeared nor contacted Plaintiff's counsel to meet the case management plan deadline. Concern of proper service prompted the first request for extension. It was at this time Plaintiff's counsel noticed the complaint should have named Defendant as *Anne Fontaine USA, Inc.* instead of *Anne Fontaine, Inc.* To address this discrepancy and ensure Defendant has proper notice in this case, Plaintiff filed an Amended Complaint on March 15, 2018, naming *Anne Fontaine USA, Inc.* as Defendant. We currently await an executed summons from *Anne Fontaine USA, Inc.*'s registered agent for filing with the Court.

This matter is currently scheduled for an initial conference on April 12, with the proposed case management plan due April 5, 2018. We respectfully request that the initial conference be further adjourned to May 3, 2018, to ensure proper service and allow the Defendant time to answer. This is the Plaintiff's second request for adjournment of the initial conference. This request is not made for purposes of delay and will not prejudice the Defendant. Thank You for Your consideration.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'JL Merino'.

Javier L. Merino, Esq.

GRANTED. The initial pretrial conference scheduled for April 12, 2018 is ADJOURNED to May 3, 2018, at 10:20 a.m. The parties shall submit their joint letter and proposed case management plan by April 26, 2018.

SO ORDERED.

Dated: March 28, 2018  
New York, New York

  
ANALISA TORRES  
United States District Judge